

EXHIBIT 2



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

May 2, 2022

Via Email

John E. Deaton, Esq.
Deaton Law Firm
450 North Broadway
East Providence, RI 02914

Re: Amicus Curiae in *SEC v. Ripple Labs Inc. et al.*, No. 20-cv-10832 (AT)(SN) (S.D.N.Y.)

Dear Counsel:

I write in response to your letter of April 27, 2022 requesting “limited” access to certain non-public documents to assist in the preparation of an Amicus Brief to the court.

Pursuant to her October 4, 2021 Order, Judge Torres stated that she may allow amicus curiae to assist the Court “by briefing legal issues relevant to the case *as approved in advance by the court.*” (D.E. 372 at p. 11 (emphasis added)). Given that you have not received approval in advance by the Court, we respectfully decline your request to meet and confer or to produce any of the documents described in your letter. Moreover, we note that the Court has limited amici participation to “legal as opposed to factual issues” (D.E. 371 at p. 11), and see no reason to share discovery material for this discrete purpose. *See, e.g., United States v. Smith*, 985 F. Supp. 2d 506, 545 (S.D.N.Y. 2013) (“Defendants have not explained the need to share discovery materials with amicus counsel, who presumably would be seeking leave to file memoranda on discrete legal issues that would not require them to be in the weeds of discovery.”) Accordingly, we will oppose any efforts to go beyond the Court’s Order.

Sincerely,

/s/ Pascale Guerrier
Pascale Guerrier

cc: All counsel (via email)